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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA, Plaintiff, vs. LEV ASLAN DERMEN, Defendant.	DEFENDANT’S SUPPLEMENTAL MOTION FOR REVIEW OF MAGISTRATE JUDGE’S ORDER OF DETENTION OF LEV DERMEN Case No. 2:18-cr-00365-JNP-BCW
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On behalf of Mr Derman, we provide the following information for consideration by the Court and counsel as a follow up to the colloquy during the conclusion of Mr. Dermen’s October 3, 2018 bail hearing to alleviate any outstanding concerns regarding flight.

Mr. Dermen is prepared to retain the services of Guidepost Solutions LLC (“Guidepost”), a security company, to monitor his home confinement as a condition of bail. Guidepost is recognized as the preeminent provider of pretrial security solutions. Guidepost has had numerous court appointments to monitor the conduct of organizations and have received assignments from or with the approval of the U.S. Department of Justice. The Los Angeles branch of Guidepost is headed by former Assistant United States Attorneys Asha Muldro and Matthew Zandi.

Mr. Zandi has confirmed his willingness to oversee Mr. Dermen’s pretrial release. Mr. Zandi’s tenure in public service has included several significant posts with the U.S. Department of Justice including Assistant U.S. Attorney; Senior Trial Attorney at Main Justice, Civil Division; Director of the Affirmative Civil Enforcement Taskforce; and Deputy District Attorney for Orange County, California. In 2006, he was nominated by the President and the Attorney General to serve as Associate Attorney General for the Office of Special Counsel.

Guidepost security personnel and armed guards consist of former, retired, and off-duty federal and state law enforcement officers as security personnel. All guards assigned to Mr. Dermen’s pretrial monitoring will be appropriately licensed and insured.

Guidepost proposes to implement the following terms to assure Mr. Dermen’s appearance during the pendency of this action:

- i) Guidepost will conduct an initial survey of Mr. Dermen’s Los Angeles residence and install security cameras and alarms as needed;
- ii) Guidepost will place 24-hour armed security personnel at the residence. There will be one supervisory security professional overseeing and scheduling the security detail which will include two guards on assignment at all times;
- iii) Guidepost security personnel will require all visitors to provide identification and complete a sign-in sheet prior to entering the residence;

- iv) Guidepost armed security are appropriately licensed and insured. Guidepost is agreeable to use of physical force if needed for any purpose to ensure compliance with bail conditions and Mr. Dermen's appearance;
- v) Guidepost will operate under the direction and mandate of the Court and Pretrial Services. Guidepost agrees to communicate with Pretrial Services, the Court, and/or the United States Attorney's Office as required by the Court for the purpose of confirming Mr. Dermen compliance with pretrial release conditions;
- vi) Mr. Dermen will be restricted from leaving his home except for purposes of medical treatment, counsel meetings at the law offices of Geragos & Geragos located at 644 S. Figueroa St., Los Angeles, California, and court appearances with prior notification to pretrial services. GuidePost Solutions' guards will provide a security vehicle and be required to travel and monitor Mr. Dermen during any outing; and
- vii) Guidepost security personnel will travel with Mr. Derman by car upon his release from Davis County Jail to his residence in Los Angeles, California with an operational GPS device for the duration of travel.

These conditions will substantially mitigate any concern of flight. Mr. Zandi is available to appear before the Court, counsel, and pretrial services on behalf of Guidepost to address the foregoing terms upon the Court's request.

Respectfully submitted.

Dated: October 3rd, 2018

/s/Mark J.Geragos

Mark J. Geragos

/s/Jon D.Williams

Jon D.Williams

